

1 Martha G. Bronitsky
Chapter 13 Standing Trustee
2 Po Box 5004
Hayward, CA 94540
3 (510) 266- 5580

4 Trustee for Debtor(s)

5
6 UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
7 OAKLAND DIVISION

8 In re

9 Paul Anthony Green

Chapter 13 Case No. 19-42436-RLE13

10
11 debtor(s)

12 **DECLARATION REGARDING DEFAULT AND REQUEST FOR ORDER OF DISMISSAL**

13 Comes now Martha G. Bronitsky, Chapter 13 Trustee in the above captioned matter, and
14 requests that the above captioned case be dismissed for cause and upon the following:

15
16 **Declaration Regarding Default**

17
18 The above named debtor(s) is/are in default under the terms of the confirmed plan. Based
19 upon said default, I served upon the debtor(s) and counsel for debtor(s), a MOTION TO DISMISS
20 CHAPTER 13 CASE FOR FAILURE TO MAKE PLAN PAYMENTS [hereinafter "MOTION"]
21 and signed on August 16, 2021. Said MOTION required the debtor to either 1.) bring the case
22 current, or 2.) meet and confer with the Trustee and sign a stipulation resolving the default, or 3.)
23 file and serve an application or motion which would resolve the default. Said MOTION also further
24 provided that upon failure to complete, within 21 days after the date of the MOTION, one of the
25 foregoing, the case would be dismissed forthwith without further notice or hearing.
26
27

1 The debtor(s) failed to respond to the MOTION in that they have 1.) failed to bring the case
2 current, the debtor(s) is/are still in default \$12,384.00, which includes this months payment. The
3 last payment was made on July 09, 2021 in the amount of \$4,128.00 2.) have failed to meet and
4 confer with the Trustee to enter into a stipulation resolving the default, or 3.) have failed to file and
5 serve an application or motion resolving the default. The debtor(s) remain in default under the
6 terms of the confirmed plan. Debtor(s) was/were noticed that the case would be dismissed forthwith
7 if the debtor(s) failed to respond to and act upon the MOTION and resolve the default. As of the
8 date of this declaration, the debtor(s) has/have failed to act upon the MOTION.

9
10 Wherefore, I declare under penalty of perjury that the foregoing is true and correct.

11 Executed this date in Hayward, California.

12 Date: September 13, 2021

/s/ Martha G. Bronitsky
Signature of Martha G. Bronitsky
Chapter 13 Standing Trustee

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have served a copy of the within and foregoing document on the debtor (s), counsel for debtor (s), and if applicable, the creditor, creditor representatives and the registered agent for the creditor by depositing it in the United States mail with first class postage attached thereto.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Paul Anthony Green

Po Box 56333
Hayward,CA 94545

(Debtor(s))

Financial Relief Law Center
1200 Main St #G
Irvine,CA 92614

(Counsel for Debtor)

Date: September 13, 2021

/s/ CHRISTIE PINEDA
CHRISTIE PINEDA